

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE
OPINIONS OF KALIOPI PANAGOS, PHARM.D., R.Ph.**

PLEASE TAKE NOTICE that on July 5, 2022, or as soon thereafter as counsel may be heard, the undersigned Defendants' Executive Committee counsel, on behalf of the undersigned Defendants, shall move for an entry of Order excluding the opinions of Plaintiffs' expert, Kaliopi Panagos, Pharm.D., R.Ph., pursuant to Federal Rules of Evidence 104, 403, 702, and 703.

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter and the Certification of Victoria Davis Lockard, Esq. together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 3, 2022

Respectfully submitted:

By: /s/ Victoria Davis Lockard
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CERTIFICATE OF SERVICE

I, Kate Wittlake, an attorney, hereby certify that on May 3, 2022, I caused a copy of the foregoing document to be served on all counsel of record via CM/ECF.

/s/ Kate Wittlake
Kate Wittlake